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FILED IN THE U.S. DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

JUL 10 2018

SEAN F. MCAVOY, CLERK
_____, DEPUTY
YAKIMA, WASHINGTON

8 UNITED STATES DISTRICT COURT
9 FOR THE EASTERN DISTRICT OF WASHINGTON

10
11 UNITED STATES OF AMERICA,

1:18-CR-2039-SAB

12 Plaintiff,
13
14 vs.

INDICTMENT

Ct. 1: 18 U.S.C. §§ 2241(a)(1) &
§ 2 – Attempted Aggravated Sexual
Abuse

15 MARIA ANDREA GONZALEZ, NICOLE
16 LEE SUNNY CLOUD, BROOKLYN
17 MARIE HERNANDEZ-PROCTOR, and
18 LATISHA LAVERN BIRDSONG,

19 Defendant.

20
21 The Grand Jury charges:

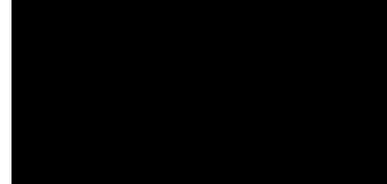
22
23 COUNT 1

24 On or about May 21, 2018, in the Eastern District of Washington, within an
25 institution and facility in which persons are held in custody by direction of and
26 pursuant to a contract and agreement with the head of any Federal department and

1 agency, the defendant's, MARIA ANDREA GONZALEZ, NICOLE LEE SUNNY
2 CLOUD, BROOKLYN MARIE HERNANDEZ-PROCTOR, and LATISHA
3 LAVERN BIRDSONG, did knowingly attempt to cause the victim, Victim 1, to
4 engage in a sexual act, to wit, penetration of the genital opening by hand and finger,
5 by the use of force against Victim 1, in that Victim 1 was forcibly held down on the
6 ground; all in violation of 18 U.S.C. §§ 2241(a)(1), 2.

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10 DATED: July 10, 2018.

11 A TRUE BILL
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